

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CYNTHIA PRYOR,

)
Plaintiff,
) Case No.: 2020-CV-28
)
-vs-
) Judge: Judge John J. Tharp, Jr.
)
TARGET CORPORATION
) Magistrate Judge: Judge Sunil R. Harjani
)
)

Defendant.

TARGET CORPORATION'S AMENDED PRIVILEGE LOG

DOCUMENT/COMMUNICATION/ INFORMATION	AUTHOR	DATE	PRIVILEGE
Notes taken by the claim representatives for Target in anticipation of litigation for purposes of evaluating the claim and to assist Counsel in the defense and investigation of the claim. None of these notes have been distributed outside of the claims representatives and attorneys working on and evaluating this case for Target.	Claims representatives for Target.	The dates on which the notes were prepared and will continue to be prepared are many, various and ongoing.	Attorney/client, insurer/insured, and work-product privileges. See <i>Consolidation Coal Co. v. Bucyrus-Erie Co.</i> , 89 Ill. 2d 103, 432 N.E.2d 250 (1982); <i>People v. Ryan</i> , 30 Ill. 2d 456, 197 N.E.2d 15 (1964); <i>Mlynarski v. Rush Presbyterian-St. Luke's Med. Ctr.</i> , 213 Ill. App. 3d 427, 572 N.E.2d 1025 (1991); <i>Lower v. Rucker</i> , 217 Ill. App. 3d 1, 576 N.E.2d 422 (1991), and <i>Rapps v. Keldermans</i> , 257 Ill. App. 3d 205, 628 N.E.2d 818 (1993).

<p>Correspondence between the claim representatives for Target and attorneys, and those working under and at the direction of attorneys working on this case for Target regarding the status of the case, evaluation of the claim, trial strategy and investigation of the claim. None of these reports have been distributed outside of the claims representatives and attorneys, and those working under and at the direction of attorneys working on and evaluating this case for Target.</p>	<p>Claims representatives for Target and attorneys for Target.</p>	<p>The dates on which the correspondence was prepared and will continue to be prepared are many, various and ongoing.</p>	<p>Attorney/client, insurer/insured, and work-product privileges. See <i>Consolidation Coal Co. v. Bucyrus-Erie Co.</i>, 89 Ill. 2d 103, 432 N.E.2d 250 (1982); <i>People v. Ryan</i>, 30 Ill. 2d 456, 197 N.E.2d 15 (1964); <i>Myinarski v. Rush Presbyterian-St. Luke's Med. Ctr.</i>, 213 Ill. App. 3d 427, 572 N.E.2d 1025 (1991); <i>Lover v. Rucker</i>, 217 Ill. App. 3d 1, 576 N.E.2d 422 (1991), and <i>Rapps v. Keldermans</i>, 257 Ill. App. 3d 205, 628 N.E.2d 818 (1993).</p>
<p>Notes taken by Counsel retained by Target to defend this litigation, in regard to investigation and evaluation of the claim, trial strategy and defense plan, which notes have not been distributed to or shared with anyone other than the attorneys at Johnson & Bell, Ltd. working on and evaluating this case for Target.</p>	<p>Attorneys at Johnson & Bell, Ltd.</p>	<p>The dates on which the notes were prepared and will continue to be prepared are many, various and ongoing.</p>	<p>Attorney/client and work-product privileges. See <i>Consolidation Coal Co. v. Bucyrus-Erie Co.</i>, 89 Ill. 2d 103, 432 N.E.2d 250 (1982); <i>People v. Ryan</i>, 30 Ill. 2d 456, 197 N.E.2d 15 (1964); <i>Myinarski v. Rush Presbyterian-St. Luke's Med. Ctr.</i>, 213 Ill. App. 3d 427, 572 N.E.2d 1025 (1991); <i>Lover v. Rucker</i>, 217 Ill. App. 3d 1, 576 N.E.2d 422 (1991), and <i>Rapps v. Keldermans</i>, 257 Ill. App. 3d 205, 628 N.E.2d 818 (1993).</p>

Reports generated by Counsel for Target and those working under and at the direction of attorneys working on this case for Target in regard to investigation and evaluation of the claim, status of the case, trial strategy and defense plan. None of these reports have been distributed outside of the claims representatives and attorneys, and those working under and at the direction of attorneys working on and evaluating this case for Target.

Target's legal department and defense counsel for Target, and those acting under their direction.

The dates on which the notes were prepared and will continue to be prepared are many, various and ongoing.

Attorney/client and work-product privileges. See *Consolidation Coal Co. v. Bucyrus-Erie Co.*, 89 Ill. 2d 103, 432 N.E.2d 250 (1982); *People v. Ryan*, 30 Ill. 2d 456, 197 N.E.2d 15 (1964); *Mynarski v. Rush Presbyterian-St. Luke's Med. Ctr.*, 213 Ill. App. 3d 427, 572 N.E.2d 1025 (1991); *Lower v. Rucker*, 217 Ill. App. 3d 1, 576 N.E.2d 422 (1991), and *Rapps v. Keldemanns*, 257 Ill. App. 3d 205, 628 N.E.2d 818 (1993).

Respectfully submitted,
Johnson & Bell, Ltd.

/s/Robert M. Burke
One of the Attorneys for Defendant, Target Corporation

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